

# **RECORD OF DECISION**

## **Nucla-Telluride Transmission Line Project**

**U.S. Department of Agriculture**

**RURAL UTILITIES SERVICE**

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**MARCH 2003**

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## **I. INTRODUCTION**

### **A. Background**

In 1998 Tri-State Generation and Transmission Association (Tri-State) submitted applications with the U.S. Department of Agriculture (USDA) Forest Service (Forest Service) for a Special Use Permit (SUP), and with the U.S. Department of Interior (USDI) Bureau of Land Management (BLM) for a Right of Way (ROW) permit, for the construction and operation of a 115 kilovolt (kV) transmission line across the Uncompahgre National Forest (UNF) and public lands administered by the BLM. Tri-State is also seeking financing for the project with the USDA, Rural Utilities Service (RUS).

Tri-State is a non-profit, wholesale power supply cooperative that is composed of 44 members who serve major parts of Colorado, Nebraska, New Mexico and Wyoming. San Miguel Power Association (SMPA) is one of Tri-State's cooperative members, and provides power to portions of San Miguel, San Juan, Ouray, Montrose, Mesa, Hinsdale and Delores Counties in the State of Colorado.

Tri-State is proposing to construct and operate an overhead 115 kV transmission line between the Nucla Generating Station Substation in Montrose County and either the Telluride or Sunshine Substations, in San Miguel County. This project would replace an existing SMPA 69 kV line that was built in the 1940s and extends between the Nucla Generating Station Substation and the Sunshine Station.

The 115 kV transmission line project has been proposed for several reasons. Locally, the proposed project would provide a reliable backup source of power to the Telluride region and improve the quality of electrical service to a number of surrounding communities, including Norwood, Rockwood, Purgatory and Silverton. The proposed 115 kV transmission line would complete a 115 kV loop between the Hesperus and Nucla Substations. Telluride's primary power source is from the Hesperus to Telluride 115 kV line. Although this line has adequate capacity to serve the Telluride area, the Hesperus to Telluride line crosses a number of high mountain passes including Ophir, Molas and Coal Bank passes, and is subject to potential outages from avalanches, snow and ice storms, high winds and lightning. Historically, when an outage has occurred on the Hesperus to Telluride 115 kV line due to either weather conditions or routine maintenance, the Nucla-Sunshine 69 kV line had adequate capacity to serve the Telluride area as a backup system. Over the past decade, however, the growth in the Telluride area has resulted in a significant increase in demand for electrical power. In 1999, the winter peak power loads in the Telluride area were approximately 22 megawatts (MW). These loads can no longer be backed up with the Nucla-Sunshine line that has a capacity of approximately 13 MW. The 69 kV line is also over 50 years old and reaching the end of its useful life. Increasing maintenance, line repairs, and replacement of hardware and poles are required of SMPA each year to keep this line in operation. In addition to providing reliable power to the Telluride area, a number of other communities would benefit from the 115 kV line through improved quality of service. Communities that would benefit in this way encompass Norwood, Rockwood, Purgatory and Silverton.

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Regionally, Tri-State is proposing the 115 kV line to reliably serve the projected loads of three of Tri-State's cooperative members - Empire Electric Association, La Plata Electric Association, and SMPA; and to alleviate the potential for regional system overloads in the future. The 115 kV loop, created between the Hesperus and Nucla Substations, will allow Tri-State to meet their contractual obligations with the Western Area Power Administration for bulk power transfers and increase load serving capacity in southwestern Colorado. The proposed 115 kV line would provide an additional 15 MW of regional transfer capability and 30 MW of increased load serving capacity for Tri-State's members.

Power system planning for southwestern Colorado and the four corners region is coordinated through the Western Electricity Coordinating Council (WECC), formerly the Western Systems Coordinating Council (WSCC). The WSCC planning studies conducted in the mid-1990s concluded that inadequate operating conditions would occur in the future without a number of system upgrades. Overloading conditions would result when the existing regional system, termed TOT 2A, is unable to simultaneously meet peak load demands of Tri-State's members, and regional power transfers, required by the Western Area Power Administration.

Due to the regional, as well as local benefits of the proposed project, the costs of the 115 kV transmission line, estimated to be approximately 13 to 16 million dollars, would be spread among Tri-State's 44 members and estimated 950,000 ratepayers.

### **B. NEPA Compliance**

The Forest Service is the Federal lead agency responsible for compliance with the National Environmental Policy Act of 1969 (NEPA). The BLM and RUS are Cooperating Agencies. The Forest Service, in consultation with the BLM and RUS, determined that the requirements of NEPA would be best served by preparing an Environmental Impact Statement (EIS) to evaluate Tri-State's proposal and alternatives.

The Nucla-Telluride Transmission Line Project Draft EIS was prepared and made available to the U.S. Environmental Protection Agency (EPA) and the general public on March 31, 2001, and a Notice of Availability for the Draft EIS was published in the *Federal Register* on that same date. The formal comment period on the Draft EIS ended on May 31, 2001. The Final EIS was made available to EPA and the public on November 5, 2001. The Notice of Availability for the Final EIS was published in the *Federal Register* on November 23, 2001.

## **II. DESCRIPTION OF PROJECT**

Tri-State's proposed project consists of the following types of facilities:

### 115 kV Transmission Line:

- A new overhead single-circuit 115 kV transmission line would be constructed between the Nucla Substation and either the Sunshine Substation or the Telluride Substation. The total length of the 115 kV transmission line would be 45 to 50 miles, depending on the route. Tri-State has proposed an overhead transmission system that would support the 115 kV conductor on single-, H-frame, and three-pole structures, depending on the terrain and landowner negotiations.

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### Substation Expansions and Modifications:

- On-site modifications would be made at the Nucla Substation.
- The existing Norwood substation would be expanded to approximately 2 acres, or a new substation would be constructed at an alternative 2-acre site.
- Either the Telluride or Sunshine Substations would be expanded, depending on which substation serves as the termination for the 115 kV line. Substation expansions would range from 0.4 acre for the Telluride Substation to 0.7 acre for the Sunshine Substation.
- The Specie Mesa and Wrights Mesa Substations would be expanded to accommodate new 115 kV transformers. Expansions of these substations would be required, regardless of the alternative chosen.
- The Oak Hill Substation would be removed.

### Distribution System Modifications:

- In order to retain service to its customers, the project would also entail making modifications to SMPA's distribution system. Specific changes vary by alternative and include building new distribution lines and converting sections of the Nucla-Sunshine 69 kV line to distribution service.

## **III. DECISIONS TO BE MADE/AUTHORITIES**

This Record of Decision (ROD) documents findings specific to potential RUS financing assistance for the proposed project and specific terms and conditions that will apply. The RUS ROD is based on the environmental, engineering and economic acceptability of the project. The RUS decision centers around a review of the project's technical and economic justification, reliability and environmental issues, and the location, in its entirety (both federally managed lands and private property). The RUS Assistant Administrator - Electric Program is the Responsible Official for this decision.

The Forest Service and the BLM have issued their decisions in separate and distinct RODs. The Forest Supervisor for the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG) is responsible for deciding whether to issue a Special Use Permit (SUP) across the Uncompahgre National Forest (UNF) and the specific terms and conditions that will apply to the issuance of a SUP. Robert L. Storch is the Forest Supervisor and the Responsible Official for the Forest Service's decision. BLM is responsible for issuing a right-of-way across public lands administered by the BLM. The Manager of the Uncompahgre Field Office, Allan J. Belt, is the Responsible Official for this decision.

## **IV. ENVIRONMENTALLY PREFERRED ALTERNATIVE**

In accordance with the provisions of NEPA C.F.R. §1502.14(e), the Final EIS identifies the environmentally preferred alternative. Based on the EIS analysis and consideration of public comments on the Draft EIS, the environmentally preferred alternative consists of the following:

- (1) Constructing and operating a new 115 kV line between the Nucla Substation and the Norwood Substation along the Nucla-Norwood Central Alternative. With this alternative, the existing 69 kV line would be removed for most of its distance

through agricultural and residential areas of Montrose County, except where small sections of line would be retained for distribution service. The new line would cross 4.2 miles of undeveloped public lands administered by the BLM and 15.3 miles of private lands where land uses are considered more compatible than along the existing 69 kV line. No national forest system lands would be crossed between the Nucla and Norwood Substations.

- (2) Constructing and operating a new 115 kV line between the Norwood and Sunshine Substations with Subalternatives C and D. Between these substations, the environmentally preferred alternative consists of using both overhead and underground construction techniques. Undergrounding the line is environmentally preferable to overhead structures across privately owned lands of Beaver, Specie, Wilson and Sunshine Mesas due to the exceptional scenic quality that would be affected long-term by the taller overhead poles and conductors. The existing 69 kV line would be removed as part of this action alternative. Subalternatives C, D, and the undergrounding subalternative are all located on private lands.

## **V. RANGE OF ALTERNATIVES CONSIDERED**

### **A. Action Alternatives**

The proposed transmission, substation, and distribution facilities have been evaluated in the EIS according to six alternatives – three 115 kV routing alternatives between the Nucla and Norwood Substations, and two routing alternatives between the Norwood and project termination at either the Sunshine or Telluride Substations. The alternatives between the Nucla and Norwood Substations are termed the Nucla-Norwood Northern Alternative, Central Alternatives and Southern Alternative. The alternatives east of Norwood are termed the Norwood-Sunshine and Norwood-Telluride Alternatives. These are shown on Figure 1 and summarized in *Table 1*. Each EIS alternative considered changes to SMPA's substations and distribution lines, as well as the construction and operation of the proposed 115 kV transmission system. The EIS further evaluates, as subalternatives to these major EIS alternatives, a number of minor routing adjustments, as well as undergrounding across portions of Beaver, Specie, Wilson and Sunshine Mesas. In addition, three distributed generation alternatives have been evaluated in the EIS, along with the No Action Alternatives. The Distributed Generation Alternatives are termed the Large DG Alternative, Small DG Alternative and Emergency DG Alternative.

EIS alternatives considered in reaching this decision include:

- Three transmission routing alternatives between the Nucla Substation and the Norwood Substation: The Nucla-Norwood Northern Alternative, Nucla-Norwood Central Alternative, and the Nucla-Norwood Southern Alternative. A routing modification across Naturita Canyon (Subalternative A) was also considered.
- Two transmission routing alternatives between the Norwood Substation and transmission terminus: the Norwood-Sunshine Alternative and the Norwood-Telluride Alternative.
- Three distributed generation alternatives that may affect public lands: termed the Large, Small and Emergency DG Alternatives.

<p align="center"><b>Table 1</b></p> <p align="center"><b>Nucla-Telluride Transmission Line Project - Summary of EIS Action Alternatives</b></p>	
<b>EIS Alternatives</b>	<b>Description of Alternative</b>
<b>Primary Transmission Alternatives – Tri-State’s Proposed 115 kV Project</b>	
<b>Nucla-Norwood Northern Alternative</b>	115 kV transmission line would replace the existing 69 kV line in the same easement location across portions of Montrose and San Miguel counties. Existing 69 kV poles and line would be removed. Total length of 115 kV line: 16.5 miles, with 12.5 miles in Montrose County and 3.9 miles in San Miguel County. 1.5 miles of public BLM lands crossed, remaining lands are privately owned.
<b>Nucla-Norwood Central Alternative</b>	115 kV transmission line would parallel the existing Nucla-Cahone line for approximately 6 miles, then turn east, paralleling the Montrose/San Miguel County boundary. East of Naturita Canyon crossing, the 115 kV route would converge with the existing 69 kV route and enter San Miguel County at the western edge of the Norwood Gardens Subdivision. In San Miguel County, the Central Alternative would follow the same alignment as the existing 69 kV line that would be replaced. Existing 69 kV line would be removed, except for several small stretches that would be retained for distribution service. Total length of 115 kV line: 19.5 miles. Montrose County would be crossed for 15.7 miles, San Miguel County would be crossed for 3.9 miles. Lands crossed are privately owned, except for 4.2 miles of public BLM lands.
<b>Nucla-Norwood Southern Alternative</b>	115 kV transmission line would parallel the existing Nucla-Cahone line for approximately 6 miles, then turn east, paralleling the Montrose/San Miguel County boundary for 2 miles. Route then turns southeast, crossing public BLM lands and existing seismic exploration disturbances. Naturita Canyon would be crossed west of Norwood. Existing 69 kV line would be removed, except for several small stretches that would be retained for distribution service. Total length of 115 kV line: 18.2 miles, with 7.4 miles in Montrose County and 10.8 miles in San Miguel County. Lands potentially affected include 8.5 miles of public BLM lands and 9.7 miles of private lands.
<b>Norwood-Sunshine Alternative</b>	115 kV line would replace existing 69 kV line in existing easement location across 28.3 miles of San Miguel County. The 115 kV line would route across portions of Wrights, Beaver, Specie, Wilson and Sunshine Mesas. Canyons and creeks crossed through spanning would include Beaver Canyon, Specie Creek, Fall Creek, Bear Creek, Bilk Creek and the South Fork of the San Miguel River. Total length: 28.3 miles. Public lands affected include 1.1 miles of BLM lands, 1.1 miles of the UNF, and 0.6 mile of State of Colorado lands. Private lands would be crossed for 25.1 miles. Existing 69 kV line would be removed.
<b>Norwood-Telluride Alternative</b>	115 kV line would replace existing 69 kV line in existing easement location for 15.5 miles, from the Norwood Substation to the eastern edge of Specie Mesa. From this point, the 115 kV line would establish a new utility corridor routing northeasterly across Fall Creek Road and then following the upper benches and slopes of the San Miguel River Canyon. Near Lime, this alternative would converge with an existing distribution line that would be underbuilt on the 115 kV structures for 2.2 miles along the south side of the San Miguel River Canyon to the Ilium Business Park. This alternative would then converge with the existing Sunshine-Telluride 115 kV line, and be supported on double-circuit structures with this line to the Telluride Substation. Total length: 29.5 miles. Public lands crossed include 6.3 miles of BLM lands, 0.7 mile of the UNF. Private lands crossed: 22.5 miles. Existing 69 kV line would be removed or portions retained for distribution service.
<b>Transmission Subalternatives – Replacements To Portions of the Primary Transmission Alternatives</b>	
<b>Minor Routing Changes --</b>	
<b>Subalternative A</b>	Would replace a small section of the N-N Southern Alternative at Naturita Canyon. Sub. A. would route the 115 kV line down into the canyon, rather than spanning the canyon rims. Total length: 1.8 miles. Land ownership: Public BLM lands
<b>Subalternative B</b>	Would replace a small section of the Norwood-Sunshine and Norwood-Telluride Alternatives. Sub. B would route the 115 kV line to the north of the Hillside (also known as Fitts Subdivision). Total length: 1.0 mile. Land ownership: Private
<b>Subalternative C</b>	Would replace a small section of the Norwood-Sunshine or Norwood-Telluride Alternative. Sub. C would route the 115 kV line to the south of the Hillside (also known as Fitts Subdivision). Total length: 1.4 miles. Land ownership: Private

<p align="center"><b>Table 1</b></p> <p align="center"><b>Nucla-Telluride Transmission Line Project - Summary of EIS Action Alternatives</b></p>	
<b>EIS Alternatives</b>	<b>Description of Alternative</b>
<b>Subalternative D</b>	Would replace a small section of the Norwood-Sunshine or Norwood Telluride Alternative, west of the Oakhill Substation. Sub. D. would route along irrigated field boundaries rather than crossing fields diagonally. Total length: 0.9 mile. Land ownership: Private.
<b>Subalternative E</b>	Would replace a section of the the Norwood-Telluride Alternative between Lime and the Ilium Business Park. Sub. E would avoid two line crossings of Highway 145 by routing the 115 kV line on the south side of the San Miguel River. Total length: 1 mile. Land ownership: Private.
<b>Underground Technology</b>	Would replace portions of the Norwood-Sunshine or Norwood-Telluride Alternatives. Undergrounding technology is evaluated as an alternative to overhead poles and conductors on parts of Beaver (5.6 miles), Specie (3.8 miles), Wilson (5.5 miles) and Sunshine (0.6 miles) Mesas. Lands evaluated for underground technologies are located in San Miguel County and under private ownership.
<p align="center"><b>SMPA Substation and Distribution System Changes –</b></p> <p align="center"><b>Addressed as Actions Associated with the Primary Transmission Alternatives</b></p>	
<b>Nucla Substation Modifications</b>	Would be required for all alternatives between Nucla- and Norwood Substations. Three additional 115 kV switches and a 115 kV gas circuit breaker would be added. No enlargement of the substation pad or fence line would be required. Substation located in Montrose County and owned by Tri-State.
<b>Norwood Substation Expansion</b>	Would be required for all alternatives between Nucla- and Norwood Substations. Existing 0.13 acre substation would be expanded to 2 acres to accommodate additional equipment including switches and takeoff structures, control building and site grading. Substation located in San Miguel County and lands affected are privately owned.
<b>Norwood Substation Alternative Site B.</b>	Would be an alternate site for a new enlarged Norwood Substation, to the southeast of the existing Norwood Substation. Existing 0.13 acre substation would be dismantled and new substation would be build on 2 acre site to the southeast. Distribution lines would be extended to new site.
<b>Oakhill Substation Removal</b>	Would occur as part of the Norwood-Sunshine or Norwood-Telluride Alternatives. Affected lands are in San Miguel County and privately owned.
<b>Specie Mesa Substation Modifications</b>	Would occur as part of either the Norwood-Sunshine or Norwood-Telluride Alternatives. Substation would be enlarged approximately 30 feet by 30 feet to rewire and reconnect the 115 kV transformer. Affected lands are in San Miguel County and privately owned.
<b>Wilson Mesa Substation Modifications</b>	Norwood-Sunshine Alternative would require the same changes as described for the Specie Mesa Substation. Norwood-Telluride Alternative would permit the existing Wilson Mesa Substation to be removed. Affected lands are in San Miguel County and privately owned.
<b>Sunshine Substation Modifications</b>	Norwood-Sunshine Alternative would require expansion of the Sunshine Substation. The existing substation would be expanded to the south (18 feet by 120 feet) to accommodate three additional 115 kV switches, takeoff structure and 2 gas circuit breakers. Substation is in San Miguel County.
<b>Telluride Substation Modification</b>	Norwood-Telluride Alternative would require expansion of the Telluride Substation. The existing substation would be expanded to the north (10 feet by 105 feet) for accommodate additional 115 kV switches, takeoff structure and gas circuit breakers. Substation is in San Miguel County.
<b>Retention of 69 kV line for distribution and/or extension of new distribution lines</b>	Would be required with all Primary Transmission Alternatives. SMPA would need to either retain portions of the existing 69 kV line or build new distribution lines to retain service to SMPA customers.
<p align="center"><b>Distributed Generation (DG) Alternatives</b></p>	
<b>Large DG Alternative</b>	<b>The Large Generator Alternative</b> would provide power capacity that could be used for regional and local needs. A GE Frame 6B natural gas turbine generator was assumed for this analysis and would have a rated winter capacity of 33 MW. The generator would require a site approximately 1.5 acres in size, located in or near the Ilium Valley in San Miguel County, on either private land or the UNF. This alternative would also require extensions of the existing Kinder-Morgan natural gas pipeline and a compressor station near Redvale. Under this scenario, the removal of the existing 69 kV line between the Norwood and Sunshine Substations is considered technically feasible, although SMPA has indicated that they would retain the line for distribution service. The Large Generator Alternative assumed that the 13 MW of power currently provided by the Nucla-Sunshine 69 kV line would not be available in the future.

**Table 1**  
**Nucla-Telluride Transmission Line Project - Summary of EIS Action Alternatives**

EIS Alternatives	Description of Alternative
<b>Small DG Alternative</b>	<b>The Small Generator Alternative</b> would meet the stated purpose and need for increased power reliability in southwestern Colorado and regional power transfer capability, although to a lesser degree than the proposed transmission project. The Small Generator Alternative assumed the installation of two Solar Titan 130 natural gas turbines with a combined capacity of 20 MW. The generators would require a site approximately 1.0 acre in size, located in or near the Ilium Valley in San Miguel County, on either private land or the UNF. This alternative would also require extensions of the existing Kinder-Morgan natural gas pipeline and a compressor station near Redvale. Under this scenario, the existing Nucla-Sunshine 69 kV line is assumed to remain in place and be rebuilt by SMPA over time. As such, the 13 MW of power currently provided by the Nucla-Sunshine 69 kV line was to be available.
<b>Emergency DG Alternative</b>	<b>The Emergency Backup Generator Alternative</b> was sized only to provide backup power to Telluride during an emergency outage. Similar to the Small Generator Alternative, this alternative assumed that the 13 MW of power currently available from the 69 kV line would continue to be available in the future. The Emergency Generator Alternative assumed the installation of two Solar Titan 130 natural gas turbines with a combined capacity of 20 MW. The generators would require a site approximately 1.0 acre in size, located in or near the Ilium Valley in San Miguel County, on either private land or the UNF. This alternative would also require extensions of the existing Kinder-Morgan natural gas pipeline and a compressor station near Redvale. Under this scenario, the existing Nucla-Sunshine 69 kV line is assumed to remain in place and be rebuilt by SMPA over time.

## B. The No Action Alternative

The No Action decision means that the RUS would not provide financing assistance for the project. Under this scenario, SMPA would continue to perform routine maintenance, repairs, and replace deteriorating poles in order to keep the existing Nucla-Sunshine 69 kV line operational. Due to the age of this facility, SMPA anticipates that some poles would need to be replaced each year. The replacement of poles would occur on an 'as-needed' basis, and would result in physical ground disturbances at pole sites similar to those reported in the EIS for the proposed 115 kV transmission line.

The No Action Alternative would cause power outages to SMPA customers to increase over time. Scheduled and unscheduled outages would occur when the Telluride-Hesperus line is out of service, since the Nucla-Telluride Line no longer has sufficient capacity to back-up the Telluride loads. Power outages and diminishing power quality would also occur due to the age and design of the existing Nucla-Telluride 69 kV line since this facility does not provide for lightning protection.

The ramifications of the Telluride Area not having reliable power could range from temporary inconveniences in the summer, to risks to human health and safety if an outage occurs on the Hesperus-Telluride line in the winter. Historically, outages in the area have been of relatively short duration, ranging from several minutes to two-and-a-half hours. Should the Hesperus-Telluride line be put out of service in the winter, however, an outage could last up to several days or weeks until Tri-State was able to access the line and make repairs. An extended outage could result from severe winter conditions, including wind, ice and avalanche events. In this eventuality, the No Action Alternative would leave Telluride and the surrounding region susceptible to prolonged blackouts or rolling brownouts that could affect both critical community services, as well as pose a health risk to its residents and visitors. Approximately 3,000 of SMPA's customers would be affected

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by blackouts or brownouts due to a outage on the Hesperus-Telluride line. Although it is unknown whether such a severe power outage event will occur, the Hesperus-Telluride line is particularly susceptible to severe winter storms since it is one of the highest transmission lines in the U.S., being routed over three mountain passes, Molas, Coal Bank and Ophir.

Long-term, the No Action Alternative would also result in SMPA rebuilding the existing 69 kV line to present day standards. In this eventuality, the environmental impacts of the No Action Alternative would be similar to those anticipated from the proposed project. Additional NEPA review may be required at that time.

## **VI. DECISION AND REASONS FOR DECISION**

### **A. Decision**

RUS has made the following decisions with respect to this project:

- RUS has determined that the NEPA process has been satisfied with respect to a potential request for financing assistance from Tri-State for this project.
- RUS has reviewed the project justification and associated engineering studies and agrees that the proposed project meets the purpose and need. The proposed project, with all overhead construction, was approved by RUS as part of a Tri-State Construction Work Plan.
- The line would be constructed in accordance with the FEIS. RUS has determined that the proposed project would be approximately 48 miles in length and be constructed on the Nucla-Norwood Central Corridor and the Norwood-Sunshine Alternative Corridor. (Refer to Figure 1). Subalternatives C and D may also be used by Tri-State for the routing of the transmission facilities. Primary transmission structures will include wood pole H-frame and single wood pole. The right-of-way width will vary between 75 feet for single poles and 100 feet for H-frame structures. The number of structures per mile would range from 7 (for H-frame poles) to 12 (for single poles). Associated facilities would include expanding the Norwood Substation at its current location; making facility modifications to the Nucla, Species Mesa, Wilson Mesa and Sunshine Substation to accommodate the new 115 kV line; and dismantling the Oakhill Substation. Modifications to sections of San Miguel Power Association's distribution system would also be required.
- Historically, RUS has not approved financing of underground transmission systems in rural areas. RUS prefers overhead transmission line construction for this project and would probably not approve the financing of an underground transmission line on the Beaver, Specie, Wilson and Sunshine Mesas. RUS has reviewed Tri-State's Underground Policy No. 054 that states that Tri-State will consider construction of underground high voltage facilities when the local jurisdictions or landowners agree to bear the increased cost of the underground facilities. RUS has found this policy to be both reasonable and prudent. The policy is also in agreement with other major utilities.

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- RUS has also reviewed the option of using a compact pole design to reduce visual effects of the project and agrees that it would be acceptable mitigation measure to reduce the visual impacts of the transmission line in certain areas.
- This decision is based on the following documents:
  - *Nucla-Telluride Transmission Line Draft Environmental Impact Statement*, March 2001.
  - *Nucla-Telluride Transmission Line Final Environmental Impact Statement*, November 2001.
  - *Nucla-Telluride 115 kV Transmission Line Project: Cable System Evaluation Report*, February 1999
  - *Nucla-Telluride Transmission Line Project Underground Cable Systems*, September 2001
  - *Nucla-Telluride 115 kV Transmission Line Project Technical Justification and Associated Engineering Studies*, April 1999.

### **B. Reasons for the Decision**

RUS's decision is to select the environmentally preferred alternative described in the FEIS with the exception of undergrounding sections of the transmission line. RUS prefers the transmission line to be constructed completely overhead. The primary reasons for this decision are explained below.

#### **Reasons for Selecting the Nucla-Norwood Central and Norwood-Sunshine 115 kV Transmission Alternatives Over the No Action Alternative --**

1. Tri-State and its member SMPA are responsible for providing reliable and safe power to their customers. Based on the results of the EIS analysis for the No Action and Action Alternatives, and the applicant's stated purpose and need for the project, the RUS has determined that the replacement of the existing 69 kV line with the proposed 115 kV transmission line is in the best public interest. The selected alternative will provide a means for securing reliable power to the Telluride Region without causing unnecessary damage to the environment.
2. The No Action Alternative would leave the Telluride Region susceptible to prolonged outages that could pose public health and safety risks during severe winter conditions, as well as impact the economic health of Telluride's recreation and resort economy. RUS concurs with the outage risks described by Tri-State, although the probability of an extended outage occurring is unknown. Long-term, the No Action Alternative would result in increasing outages, and increased maintenance and repair costs as poles must be replaced due to age and deterioration. Increasing outages or a prolonged outage during severe winter conditions could threaten public health and safety, and impact the Telluride economy. A power outage during winter conditions could last up to several weeks

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and could impact residential heating, Telluride's tourism economy, and the operation of emergency and medical facilities.

3. Long-term, both physical ground disturbances and visual impacts from maintaining and upgrading the 69 kV line would be similar to the proposed 115 kV transmission project. SMPA would continue to maintain the existing Nucla-Sunshine 69 kV line, replacing poles and hardware on an as-needed basis. As part of their maintenance obligations, SMPA would replace the deteriorating 69 kV poles with similar size poles; however, taller poles may be required by RUS in the future to meet present-day design standards. SMPA would replace the existing 69 kV poles and hardware on an as needed basis. The average height of the existing 69 kV poles is 40 feet, while the present-day design standards for 69 kV poles are approximately 56 feet. In comparison, the height of the proposed 115 kV transmission line would be only 5 to 15 feet taller, on average, varying from 60 to 70 feet, depending on pole type and whether a compact pole design is used. Thus, under the No Action Alternative, the long-term physical and visual impacts would be similar to the proposed 115 kV project.
4. The No Action Alternative would disproportionately impact SMPA ratepayers. Under the No Action Alternative, SMPA's estimated 10,000 ratepayers would need to finance all annual repairs and maintenance costs for the existing 69 kV line. Long-term, if, and when, the 69 kV line is rebuilt to present day RUS standards, this rebuild, which would cost only 15 per cent less than the 115 kV transmission line, would also be financed solely by SMPA's ratepayers. In comparison, Tri-State's 950,000 ratepayers would absorb the estimated 13 to 16 million dollar present-day costs of the proposed 115 kV transmission line.

### **Reasons for Selecting the Nucla-Norwood Central Alternative Over the Northern and Southern Alternatives --**

5. The Nucla-Norwood Central Alternative minimizes the impacts to the environment as a whole, considering both public and private land issues. The Central Alternative avoids and minimizes the substantially greater human resource impacts that would result from the Northern Alternative and the greater natural resource impacts that would occur from the Southern Alternative. The Central Alternative would allow SMPA to remove the existing 69 kV line in Montrose County, where the line currently impacts irrigated agriculture, the community of Redvale and residential uses on Wrights Mesa. The Central Alternative also avoids the Southern Alternative's impacts to the natural environment, including new access roads in currently inaccessible areas, and crossing a central undeveloped part of Naturita Canyon. The Central Alternative minimizes both the substantially greater human resource impacts of the Northern Alternative and the natural resource and recreation impacts of the Southern Alternative by following the Montrose and San Miguel County boundary. In addition to being a jurisdictional boundary, this part of the county boundary line also largely defines the edge between the developed agricultural land uses to the north and the natural landscape of Naturita Canyon to the south. Impacts to biological, cultural, and water resources will be less than significant, with implementation of the EPM's, and BMP's.

### **Reasons for Selecting the Norwood-Sunshine 115 kV Transmission Alternative Over the Norwood-Telluride 115 kV Transmission Alternative -**

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6. The Norwood-Sunshine Alternative minimizes and avoids impacts to the environment when compared to the Norwood-Telluride Alternative. The selected route avoids and minimizes environmental impacts by routing the 115 kV transmission line along an established utility corridor across the mesas of San Miguel County, rather than establishing a new utility corridor on the upper benches, steep slopes and canyon floor of the San Miguel River.
7. The Norwood-Sunshine Alternative will avoid and minimize potentially significant visual impacts to public lands and regionally important public views and recreation resources. Protection and minimization of impacts to regionally significant visual resources is considered a key issue in this decision. The selected route avoids and minimizes impacts to the San Juan Skyway National Scenic Byway, to scenic landscapes of the San Miguel River Canyon, and the BLM's San Miguel Canyon Area of Critical Environmental Concern (ACEC) and Special Recreation Management Area (SRMA). Although Subalternative E to the Norwood-Telluride Alternative would have beneficial impacts to the UNF and to the San Juan Skyway National Scenic Byway, where two existing distribution line crossings of the highway would be eliminated; the overall impacts of the Norwood-Telluride Alternative would still remain substantially greater along other portions of the route when compared to the Norwood-Sunshine Alternative.
8. The Norwood-Sunshine Alternative will minimize impacts to the natural environment and physical ground disturbances by crossing the flat to rolling mesas, and avoiding the steep slopes and areas of potential slope instability along the San Miguel River Canyon that would be impacted by the Norwood-Telluride Alternative. The selected route also minimizes impacts to Mexican Spotted Owl habitat, and impacts riparian streams and habitats. No new permanent roads are proposed by the applicant. Helicopter construction will be used across the San Miguel River Canyon ACEC and SRMA. Environmental Protection Measures, committed to by the applicant, will reduce potential impacts to the natural, biological and cultural environments to a level less than significant.
9. The Norwood-Sunshine Alternative may significantly affect private views and property values on Beaver, Specie, Wilson and Sunshine Mesas. While it is recognized that these impacts may be significant to specific individual landowners, these impacts are considered less, overall, when compared to the impacts to public views and viewers that would be affected by the Norwood-Telluride Alternative. In considering the tradeoffs between these two routes, the RUS has weighed the impacts to public views and scenic resources and to private lands and visual concerns. In considering the magnitude of visual impacts to highway, residential, and recreation viewers that would occur from the Norwood-Telluride Alternative, and the importance of public views along the San Miguel River Canyon and San Juan Skyway National Scenic Byway, the Norwood-Sunshine Route is concluded to be the route that best protects the scenic resources of the region while also providing for reliable power. Impacts to individual landowners may be mitigated in instances where a compact pole design, 55 or 60 feet in height, would be screened by aspens. The Final EIS identified the compact pole design as a potential mitigation measure in the Visual Resources Section (Final EIS, Section 3.10, page 3.10-29) and evaluates undergrounding as a subalternative across portions of Beaver, Specie, Wilson and Sunshine Mesas. In these locales, undergrounding would substantially avoid and minimize the long-term visual impacts of the proposed

transmission line. However, RUS prefers overhead transmission line construction and historically does not approve financing for underground transmission line construction in rural areas. The EIS does not evaluate the economic feasibility of this alternative, however. Tri-State has a policy to consider undergrounding 115 kV transmission lines in instances where the landowner pays the difference between overhead and underground construction and operation costs. Since these lands are privately owned rather than public lands, the EIS analysis is limited to disclosing the major environmental and cost tradeoffs for purposes of public disclosure.

In considering the long-term visual impacts of the project, RUS has weighed the potential for the compact pole design to reduce significant visual effects reported in the FEIS, as well as the long-term changes that would occur to the 69 kV line, regardless of the proposed 115 kV project.

The compact pole design concept is incorporated as a mitigation measure in the FEIS, Section 3.10 (FEIS, page 3.10-29). The compact pole design, proposed by Tri-State as part of the San Miguel County Special Use Permit Application is consistent with this FEIS recommendation and would substantially reduce the potential visual effects of the 115 kV system across parts of Beaver, Specie, Wilson and Sunshine Mesas in San Miguel County. The height of the compact 115kV poles would be approximately 60 feet, as compared to 70-80 feet for a conventional 115 kV single pole. The compact pole design would be effective in mitigating significant visual effects in areas where the reduced height of these poles will either alleviate the obstruction of scenic views or where the compact poles will be screened by aspen groves or other trees that typically reach heights of 55 to 60 feet on the mesas. The compact pole design would also reduce the visibility of the conductors since two of the three conductors would be arranged horizontally, rather than stacked vertically.

RUS's decision has also considered the long-term differences that are expected to occur on the mesa due to the necessary replacement of the 69 kV line. The existing 69 kV line is reaching the end of its expected life and must be replaced either in whole, or as part of SMPA's maintenance program over the next decade. The RUS provides financing assistance to local cooperatives, including SMPA, for the replacement of existing lines. Funding for the 69 kV line replacement would be contingent on SMPA meeting RUS design standards that have been developed in accordance with National Electric Safety Code guidelines for electrical safety and reliability. In order for SMPA to apply for and receive funding assistance for the replacement of the existing 69 kV system, SMPA would need to meet RUS's present-day design standards. As reported in the FEIS, present-day design standards for 69 kV systems consist of poles that average 56-feet in height. When compared to the 56-foot average height of the present day 69 kV system, RUS finds the impacts of the proposed 60-foot tall 115 kV poles incremental and not significant.

**Reasons for Selecting the Nucla-Norwood Central and Norwood-Sunshine 115 kV Transmission Alternatives Over the Distributed Generation Alternative(s) --**

Alternative generation technologies were suggested during scoping and considered in the EIS. The EIS analyzes three Distributed Generation (DG) Alternatives that respond to varying degrees to Tri-State's needs for increased local power reliability and regional improvements in load serving and power transfer capabilities on the

southwestern Colorado grid system. The following factors have been considered in deciding not to select a Distributed Generation Alternative:

***Large Generation Alternative --***

10. The Large DG Alternative could provide local and regional benefits similar to the proposed project, however, SMPA ratepayers located along the Nucla-Norwood section of the 69 kV line would have less reliable power than they do today. Among the DG Alternatives, the Large DG Alternative could best meet the regional and local power needs set forth by Tri-State, and the private interests of landowners living along the existing 69 kV line between Norwood and Sunshine. The Large DG Alternative could provide adequate amounts of back-up power to the Telluride Area, in the event of an outage on the Telluride-Hesperus line during peak winter conditions. With respect to regional benefits, the Large DG Alternative would increase load serving capacity in southwestern Colorado by 11 MW and increase TOT 2A transfer benefits by 17 MW. Local benefits would come at the expense of the larger public and other SMPA ratepayers, served by the Nucla-Norwood section of line, however. Since the 69 kV line would terminate at Norwood, no loop service would exist for SMPA ratepayers served by the radial Nucla-Norwood line. Consequently, in the event of an outage along this section of 69 kV line, affected SMPA customers would have no backup source of power. Consequently, while the Telluride Area would benefit from increased power reliability, the Norwood Area would suffer from a decrease in reliability over present day conditions.
11. The larger public could be significantly impacted by the construction and operation of generator facilities on or near public BLM or National Forest System lands near Telluride. Locally, the distributed generator facilities would potentially result in significant visual and noise impacts in the vicinity of the Ilium Valley. Visual impacts would result from the presence and operation of the generator facility. The large generator would have 50-foot high stacks and a generator vapor plume during the winter that could reach 100 feet in height. These visual effects would affect both public recreation areas administered by the BLM and Forest Service and private properties. The Large Generator could create ice fog during cold winter conditions that, depending on the location of the generator, could pose a safety risk to SR 145, the South Fork Road and Telluride Airport. Regionally, this alternative also has the potential to reduce visibility conditions at Class I and II Wilderness Areas. Based on the results of EPA modeling studies, the EIS analysis concluded that the Large Generator Alternative has the potential to impair visibility conditions at the Mount Sneffels, Big Blue, and Lizard Head Class II Wilderness Areas, and the Weminuche and La Garita Class I Wilderness Areas. A Large Generator would emit noise at levels that would likely exceed the Colorado noise standards. Additional noise mitigation would be necessary to meet state noise standards.
12. In addition to the local and regional impacts to public lands and users discussed above, the Large DG Alternative would still result in similar visual and land use impacts as Tri-State's proposed project between the Nucla and Norwood Substations. Long-term, the Large DG alternative would likely result in the existing 40 foot tall 69 kV line being rebuilt by SMPA to a present-day 69 kV design standards between the Nucla and Norwood Substations. A rebuilt 69 kV line would be approximately 56 feet in height, compared to 60 to 70 feet for the proposed 115 kV transmission line.

13. Finally, the costs of the Large DG Alternative would be substantially greater than the proposed 115 kV transmission line project and would not be financed by Tri-State's 44 members, but rather SMPA's 10,000 ratepayers. Tri-State has stated that they would not propose, nor be the applicant for, a distributed generator project. Consequently, the estimated \$29 Million to \$37 Million cost of the Large DG Alternative would likely need to be financed by SMPA's 10,000 ratepayers. In comparison, the estimated \$12 Million to \$16 Million cost of the proposed 115 kV transmission line would be spread amongst Tri-State's 44 members and approximately 950,000 ratepayers. Thus, the Large DG Alternative has potentially significant fiscal impacts to the Telluride Area.

***Small and Emergency Generation Alternatives --***

14. The Small and Emergency DG Alternatives would only partially meet the local and regional needs set forth by Tri-State. Locally, both alternatives could provide backup power to the Telluride Area, although with lesser reliability than the proposed project. Regional benefits would be substantially less than the proposed 115 kV transmission line. The Small DG Alternative would provide 4 MW of additional load serving capacity to Southwestern Colorado, and 6 MW of increased TOT2A transfer capability. The Emergency DG Alternative would not provide any regional benefits in either increased load serving capacity or bulk power transfer capability.
15. The Small and Emergency DG Alternatives would not avoid or substantially minimize the physical impacts of the Proposed Project or No Action Alternative. In order to minimize the size of the generator needed for backup reliability, the Small and Emergency DG Alternatives would require that the existing 69 kV line between Nucla and Sunshine remain in service. Thus, maintenance impacts would continue and increase over time, and, long-term, the 69 kV line would likely be upgraded by SMPA to meet present day design standards. Thus, the long-term physical impacts of upgrading this line over time would be similar to the proposed project, as discussed above under the No Action Alternative.
16. The Small and Emergency DG Alternative would result in similar visual and land use impacts as Tri-State's proposed project between the Nucla and Sunshine Substations. Long-term, the Small and Emergency DG alternative would likely result in the existing 40 foot tall 69 kV line being rebuilt by SMPA to a present-day 69 kV design standards. A rebuilt 69 kV line would be approximately 56 feet in height, compared to 60 to 70 feet for the proposed 115 kV transmission line.
17. The costs of the Small and Emergency DG Alternatives would not be financed by Tri-State's 44 members, and require alternative financing by SMPA ratepayers. The Small DG Alternative would cost between \$29 Million and \$34 Million and the Emergency DG Alternative costs would be between \$24 Million and \$28 Million. Consequently, these DG alternatives would have significantly greater fiscal impacts to SMPA ratepayers when compared to the \$12 Million to \$16 Million costs of the proposed project that would be financed by Tri-State's 44 members.

## **VII. OTHER ALTERNATIVES CONSIDERED AND ELIMINATED**

A number of other routing and technology alternatives were suggested during scoping and initially considered in the screening of alternatives that would be studied in detail in the EIS. Alternatives were eliminated from further consideration if they did not meet most of

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the local and regional objectives set forth by Tri-State, were not feasible from a technology or cost perspective, or would not reduce or avoid significant environmental effects when compared to the existing 69 kV transmission alignment.

Alternative routes initially considered and eliminated are discussed in the Final EIS, Section 2.3 (pages 2-35 and 2-36) and shown on Final EIS, *Plate PROJECT-9*. The RUS has not considered the following routes since they would not avoid or minimize significant environmental impacts when compared to the existing 69 kV corridor:

- Alternative Routes Between Norwood and Sunshine/Telluride Substations -- including southern routing alternatives across the BLM's San Miguel River Canyon ACEC near the Beef Trail Road, and an alternative across Bilk Creek.

Alternative technologies and systems initially considered and eliminated are discussed in the Final EIS, Section 2.3 (pages 2-36 through 2-40). The RUS has not chosen the following types of alternative systems and technologies due to technology, cost, or environmental effectiveness limitations:

- Alternative Voltages and Systems - including a 69 kV rebuild, interconnections with the 230 kV system, and a complete underground alternative.
- Renewable Energy Sources - including hydroelectric, solar, wind and energy conservation through demand side management strategies.

## VIII. AGENCY AND PUBLIC INPUT

In order to solicit input from the appropriate agencies and the public, seven scoping meetings were held during preparation of the Draft EIS. The Notice of Intent (NOI) to prepare the EIS was published in the Federal Register on April 30, 1998. In addition to the scoping meetings, informal meetings were held with numerous landowners, and input was also received from meetings hosted by the San Miguel Energy Resource Group (SMERG) in 1999.

The Draft EIS was published for public review in March 2001. Eighty-five (85) comment letters were received on the Draft EIS. The Final EIS was published November 5, 2001. The Final EIS Volume I incorporates changes to the Draft. Responses to all comments are contained in Volume III of the Final EIS. As a result of comments on the Draft EIS, the Final EIS considers an additional underground subalternative across Beaver Mesa, and refines potential mitigation measures on private lands that may be considered by San Miguel County as part of Tri-State's Special Use Permit Application process.

## IX. FINDINGS REQUIRED BY OTHER LAWS

Numerous laws require that decisions be consistent with their provisions. The Final EIS and ROD complies or is consistent with all applicable laws including but not limited to those listed below. In addition, a number of federal, state and local permits and approvals would be required prior to construction (see Final EIS, Volume I, *Table 1.3-1*).

### A. National Environmental Policy Act of 1969 (NEPA)

The analysis in support of RUS's decisions was performed under the authorization and regulations set forth in NEPA. Due NEPA process was followed including public scoping,

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identification of issues, development of alternatives, disclosure of environmental consequences, and public comment. The entirety of documentation for this project supports compliance with this Act.

### **B. The Endangered Species Act**

The proposed project is subject to compliance with the Endangered Species Act (ESA). Early on in the project, the U.S. Fish and Wildlife Service (USFWS) identified several threatened and endangered species that may be present in the project area. In accordance with Section 7 of the ESA, formal consultation was conducted with the USFWS. A Biological Assessment (BA) was prepared (August 22, 2001) that addressed federally listed candidate species specified by the USFWS (letter dated May 5, 2001). The USFWS issued their Biological Opinion (BO) December 4, 2001. The USFWS's BO concluded that any of the alternatives chosen for the project may affect, but will not be likely to adversely affect, the southwestern willow flycatcher (*Empidonax traillii extimus*), bald eagle (*Haliaeetus leucocephalus*), Mexican spotted owl (*Strix occidentalis lucida*), and Canada lynx (*Lynx canadensis*). The BO further concludes no effect to other special status species, including black-footed ferret (*Mustela nigripes*), and two candidate species, the boreal toad (*Bufo boreas boreas*) and Gunnison sage-grouse (*Centrocercus minimus*). A Biological Evaluation (BE) was also prepared April 16, 2002 based on Forest Service guidance and review of scientific literature on distribution of endangered, threatened, sensitive and rare species. RUS has determined that the proposed project will not significantly affect any Federally listed threatened or endangered species.

### **C. Clean Water Act**

No specific provisions of the Clean Water Act apply to this Decision. Wetlands and waters of the U.S., which may be affected by this decision, are not proposed for dredge, fill, or any direct site-specific disturbance. The Nucla-Norwood Central Alternative will cross 23 major drainages and streams, mostly associated with Naturita Creek. The Norwood-Sunshine Alternative will cross one major wetland area in the vicinity of the South Fork of the San Miguel River, approximately 1.0 mile north and west of the Sunshine Substation. Five other major drainages will be crossed at Fall Creek, a tributary on Beaver Mesa, Beaver Canyon and Gurley Canyon, and Saltado Creek. The proposed project will also cross a total of 23 minor and unnamed drainages and will cross or be within 250 feet of 46 small, scattered wetland areas.

It is anticipated that all wetland areas will be avoided on public lands during final design. Wetland boundaries will be delineated and no support structures will be placed within wetland boundaries. Should impacts to wetlands be unavoidable anywhere within the corridor during final design, Tri-State will be responsible for coordination with the U.S. Army Corps of Engineers (ACOE) and mitigating impacts in accordance with ACOE permit requirements.

### **D. Clean Air Act**

There are no significant effects on any aspect of air quality covered by the Clean Air Act or associated regulations from this decision.

### **E. National Historic Preservation Act**

Consultation is required by Section 106 of the National Historic Preservation Act with the Advisory Council on Historic Preservation and the State Historic Preservation Officer. Section 106 requires special review for any undertaking that could affect historic properties that are included or eligible for inclusion in the National Register of Historic Places.

There are no known historic or archaeological sites within the Nucla-Norwood Central and Norwood-Sunshine Corridors that are listed or proposed for listing in the National Register of Historic Places. Prior to final design and construction, Tri-State will retain qualified archaeologists to conduct a survey to identify any sites within areas to be disturbed. The survey will be submitted to the appropriate federal land manager, the Colorado State Historic Preservation Officer and the RUS for review. If a site is discovered and avoidance is not possible, a mitigation plan will be developed and submitted to the appropriate agencies in compliance with 36 CFR Part 800 implementing Section 106 of the National Historic Preservation Act, 16 U.S.C. 470F, and Section 110 (16 U.S.C. 470h-2).

### **F. Executive Order 12898 (Environmental Justice)**

Executive Order 12898 (February 11, 1994, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) directs each federal agency “to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low income populations.” In July 1999, the EPA issued its Final Guidance for Consideration of Environmental Justice in Clean Air Act Reviews. The concepts explained in this guidance are applicable beyond Clean Air Act reviews.

The EPA’s guidance has been applied to the public analysis and decision processes in coming to this decision. The Nucla-Norwood Central and the Norwood-Sunshine Corridor do not disproportionately impact any minority or low income populations; and the project complies with Executive Order 12898.

### **G. Important Farmlands**

The Nucla-Norwood Central and Norwood-Sunshine corridors cross 1.8 miles of irrigated agriculture and 1.1 miles of prime farmlands. Impacts to prime farmlands will be avoided to the greatest extent possible through careful pole placements. Due to the minor amount of prime farmland potentially affected, RUS has determined that the Nucla-Telluride Transmission Line Project will not significantly impact important farmlands.

### **H. Areas of Critical Environmental Concern**

The Norwood-Sunshine Corridor will cross portions of the San Miguel River Canyon Area of Critical Environmental Concern at Beaver Canyon and Saltado Creek. The RUS has determined that the project is in conformity with the Amendment to the RMP that designated the ACEC and established management goals for the area. The RMP amendment allows utility corridors across the ACEC if the new facilities remain in the established utility corridors and if they do not increase the overall number of facilities in the corridor. The project complies with these requirements since the 115 kV transmission line would replace the existing 69 kV transmission line in the same utility corridor.

**I. Executive Order 11990 (Wetlands) of May, 1977**

This Order requires the RUS to take action to minimize destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands. In compliance with this Order, RUS direction requires that an analysis be completed to determine whether adverse impacts would result (see Final EIS, Volume I, *Table 2.2-4*). This decision is in compliance with this Order.

**J. Executive Order 11988 (Floodplains) of May, 1977**

This Order requires the RUS to provide leadership and to take action to (1) minimize adverse impacts associated with occupancy and modification of floodplains and reduce risks of flood loss, (2) minimize impacts of floods on human safety, health, and welfare, and (3) restore and preserve the natural and beneficial values served by floodplains. This decision is in compliance with this Order.

**K. Required Permits, Licenses, Grants and Authorizations**

Prior to construction, Tri-State will need to acquire a number of permits from other federal, state and local agencies. Permits are listed in the Final EIS, Volume I, *Table 1.3-1*.

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BLAINE D. STOCKTON  
Assistant Administrator, Electric Program

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Date